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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 DAVID CRISTALES-MACHADO,  
15 Defendant.

Case No. 2:25-cr-00122-APG-NJK

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Sigal Chattah, United  
18 States Attorney, and Clay Plummer, Assistant United States Attorney, counsel for the United  
19 States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo,  
20 Assistant Federal Public Defender, counsel for David Cristales-Machado, that the Preliminary  
21 Hearing currently scheduled on July 7, 2025, be vacated and continued to a date and time  
22 convenient to the Court, but no sooner than September 4, 2025.

23 This Stipulation is entered into for the following reasons:

24 1. The matter has been negotiated, and a change of plea and sentencing hearing has  
25 been set for September 4, 2025. The requested continuance will permit the change of plea  
26 hearing to be held.

2. The defendant is in custody and agrees with the need for the continuance.

3. The parties agree to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested herein is not sought for purposes of delay, but to allow parties to negotiate.

6. The additional time requested by this stipulation, is allowed, with the defendant's consent under the Federal Rules of Procedure 5.1 (d).

This is the first request for a continuance of the preliminary hearing.

DATED this 8th day of May 2025.

RENE L. VALLADARES  
Federal Public Defender

SIGAL CHATTACH  
United States Attorney

*/s/ Raquel Lazo*  
By \_\_\_\_\_

RAQUEL LAZO  
Assistant Federal Public Defender

*/s/ Clay Plummer*  
By \_\_\_\_\_

CLAY PLUMMER  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4 Plaintiff,  
5 v.  
6 DAVID CRISTALES-MACHADO,  
7 Defendant.  
8

Case No. 2:25-cr-00122-APG-NJK

**ORDER**

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10 IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled for  
11 Monday, July 7, 2025 at 4:00 p.m. be vacated and continued to **September 8, 2025, at**  
12 **4:00 p.m.**

13 DATED this 9th of May 2025.

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16 UNITED STATES MAGISTRATE JUDGE  
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